

THE HONORABLE JUDGE RICARDO S. MARTINEZ

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
SEATTLE DIVISION

DERICK D’HAITI,

Plaintiff,

NO. 2:20-CV-00358-RSM

v.

STIPULATED MOTION FOR
CONTINUANCE OF DEADLINE TO
AMEND INITIAL PLEADINGS

PHILIPS NORTH AMERICA LLC d/b/a
PHILIPS HEALTHCARE, a Delaware
limited-liability company; ABC Company and
XYZ Company,

NOTE FOR MOTION CALENDAR:
June 29, 2020

Defendants.

STIPULATED MOTION

The parties in the above-captioned action, Derick D’Haiti (hereinafter “Plaintiff”) and Philips North America LLC d/b/a Philips Healthcare (hereinafter “Philips”), by and their undersigned counsel of record, hereby submit this stipulated motion pursuant to LCR 10(g) to continue the dead to amend initial pleadings from June 30, 2020 to August 15, 2020.

Plaintiff in this matter alleges that on December 24, 2018, while working at a Philips building, he slipped and fell on a freshly waxed floor. Plaintiff further alleges that he suffered injuries because of the fall and that the incident was caused due to Philips negligent actions.

STIPULATED MOTION FOR CONTINUANCE OF
DEADLINE TO AMEND INITIAL PLEADINGS
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HOLT WOODS & SCISCIANI LLP
701 PIKE STREET, SUITE 2200
SEATTLE, WA 98101
P: (206) 262-1200 F: (206) 223-4065

Philips is attempting to identify the individuals who waxed the floor and their employer and requested an additional sixty (60) days to identify the individual's employer and join it as a potential party in this litigation. The parties previously requested an extension of the deadline to join additional parties. It was an oversight that an extension to amend the initial pleadings was not also sought at that time.

Therefore, the parties stipulate to a continuance of the deadline to amend initial pleadings from June 30, 2020 to August 15, 2020.

IT IS SO STIPULATED:

EMERALD LAW GROUP, PLLC

s/ Donna L. Mack

Donna L Mack, WSBA No. 30875
Attorney for Plaintiff

HOLT WOODS & SCISCIANI LLP

s/ Charissa R. Williams

Anthony R. Scisciani III, WSBA No. 32342
Kelsey L. Shewbert, WSBA No. 51214
Charissa R. Williams, WSBA No. 54879
Attorneys for Philips North America LLC
d/b/a Philips Healthcare

IT IS SO ORDERED:

Based on the foregoing Stipulation, IT IS HEREBY ORDERED that the deadline to amend initial pleadings shall be continued until August 15, 2020.

DATED: June 30, 2020.



RICARDO S. MARTINEZ
CHIEF UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I certify under penalty of perjury under the laws of the State of Washington, that the following is true and correct:

I am employed by the law firm of Holt Woods & Scisciani LLP.

At all times hereinafter mentioned, I was and am a citizen of the United States of America, a resident of the State of Washington, over the age of eighteen (18) years, not a party to the above-entitled action, and competent to be a witness herein.

On the date set forth below I served the document(s) to which this is attached, in the manner noted on the following person(s):

| PARTY/COUNSEL | DELIVERY INSTRUCTIONS |
|---|---|
| <u>CO / Plaintiff</u> Donna L. Mack, WSBA No. 30875 Emerald Law Group, PLLC 811 1 st Avenue, Suite 510 Seattle, WA 98104-1428 | <input type="checkbox"/> Via U.S. Mail <input checked="" type="checkbox"/> Via E-Mail <input type="checkbox"/> Via Facsimile <input type="checkbox"/> Via Overnight Mail <input checked="" type="checkbox"/> Via CM/ECF donna@emeraldgroup.com |

DATED this 29th day of June, 2020.

s/ Jessica Heath

Jessica Heath, Legal Secretary